U.S. FISH AND WILDLIFE SERVICE SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM

SCIENTIFIC NAME: Pseudognaphalium sandwicensium var. molokaiense

COMMON NAME: 'Ena'ena LEAD REGION: Region 1 INFORMATION CURRENT AS OF: April 2010 STATUS/ACTION ____ Species assessment - determined we do not have sufficient information on file to support a proposal to list the species and, therefore, it was not elevated to Candidate status ___ New candidate _X__ Continuing candidate ___ Non-petitioned X Petitioned - Date petition received: May 11, 2004 90-day positive - FR date: X 12-month warranted but precluded - FR date: May 11, 2005 N Did the petition request a reclassification of a listed species? FOR PETITIONED CANDIDATE SPECIES: a. Is listing warranted (if yes, see summary of threats below)? Yes b. To date, has publication of a proposal to list been precluded by other higher priority listing actions? Yes c. If the answer to a. and b. is "yes", provide an explanation of why the action is precluded. Higher priority listing actions, including court-approved settlements, court-ordered and statutory deadlines for petition findings and listing determinations, emergency listing determinations, and responses to litigation, continue to preclude the proposed and final listing rules for the species. We continue to monitor populations and will change its status or implement an emergency listing if necessary. The "Progress on Revising the Lists" section of the current CNOR (http://endangered.fws.gov/) provides information on listing actions taken during the last 12 months. N_ Listing priority change Former LP: ____ New LP: ___ Date when the species first became a Candidate (as currently defined): December 15, 1980 Candidate removal: Former LPN: ____ ____ A – Taxon is more abundant or widespread than previously believed or not subject to the degree of threats sufficient to warrant issuance of a proposed listing or

continuance of candidate status.

U - Taxon not subject to the degree of threats sufficient to warrant issuance proposed listing or continuance of candidate status due, in part or totally conservation efforts that remove or reduce the threats to the species.	
F – Range is no longer a U.S. territory.	
I – Insufficient information exists on biological vulnerability and threats to	support
listing.	
M – Taxon mistakenly included in past notice of review.	
N – Taxon does not meet the Act's definition of "species."	
X – Taxon believed to be extinct.	

ANIMAL/PLANT GROUP AND FAMILY: Flowering plants, Asteraceae (Sunflower family)

HISTORICAL STATES/TERRITORIES/COUNTRIES OF OCCURRENCE: Hawaii, islands of Molokai, Maui, Lanai, and Oahu

CURRENT STATES/COUNTIES/TERRITORIES/COUNTRIES OF OCCURRENCE: Hawaii, islands of Molokai and Maui

LAND OWNERSHIP: *Pseudognaphalium sandwicensium* var. *molokaiense* is found on State and private land.

LEAD REGION CONTACT: Linda Belluomini, (503) 231-6283, linda belluomini @fws.gov

LEAD FIELD OFFICE CONTACT: Pacific Islands Fish and Wildlife Office, Christa Russell, (808) 792-9400, christa_russell@fws.gov

BIOLOGICAL INFORMATION

Species Description

Pseudognaphalium sandwicensium var. molokaiense is a perennial herb, 3.9 to 25 inches (in) (10 to 64 centimeters (cm)) tall with moderate to densely woolly pubescence. Stems are olive green to white or gray and vary in their degree of erectness and branching. Leaves are linear with both surfaces densely wooly pubescent. Whitish to pale yellow flower heads occur in terminal, leafless clusters. This variety is distinguished from other varieties of the species in that the entire plant is covered in very dense white wooly pubescence; the stems are prostrate to sometimes erect, 3.9 to 11.8 in (10 to 30 cm) long; the leaves are spatulate to narrowly obovate with the lower ones usually 0.3 to 0.8 in (7 to 20 millimeters (mm)) wide; and only the tips of the involucral bract in the flower heads are exposed while the remainder is densely wooly pubescent (Wagner et al. 1999a).

Taxonomy

First described by Sherff and Degener (1948) as an infraspecific taxon in the genus *Gnaphalium*, Wagner (1997) moved the entire species to *Psuedognaphalium*. This variety is recognized as a distinct taxon in Wagner *et al.* (1999a, p. 321-322) and Wagner and Herbst (2003, p. 8), the most recently accepted Hawaiian plant taxonomy.

Habitat/Life History

Typical habitat is strand vegetation in dry consolidated dunes (Wagner et al. 1999a, p. 321-322).

Historical Range

Historically, this species was found on four Hawaiian Islands. It occurred on Molokai in Halawa Valley and Waiahewahewa gulch, on Oahu at Diamond Head and along the Waimanalo coast, on Maui in the Wailuku area, and on Lanai along the Munro trail (Hawaii Biodiversity and Mapping Program (HBMP) 2008).

Current Range/Distribution

Currently, this species is found on Molokai on the northwestern coast at Ilio Point, Moomomi Preserve, and Nenehanaupo; and on Maui in the Waiehu dunes and on Puu Kahulianapa sea cliff (HBMP 2008).

Population Estimates/Status

Currently this variety is now known from five populations along the northwest coastline of Molokai totaling 100s to perhaps as many as 20,000 individuals depending on rainfall; and from two populations on the northwest coast of Maui, one at Waiehu dunes (scattered individuals) and the second at Puu Kahulianapa (5 to 10 individuals) (F. Starr, U.S.G.S. Biological Resources Discipline, pers. comm. 2006; W. Moses, The Nature Conservancy of Hawaii, pers. comm. 2006; R. Kallstrom, The Nature Conservancy (TNC), pers. comm. 2008). It was last observed on Oahu on Diamond Head crater (5 individuals) in the 1980s (HBMP 2008).

THREATS

A. The present or threatened destruction, modification, or curtailment of its habitat or range. *Pseudognaphalium sandwicensium* var. *molokaiense* is threatened by feral goats (*Capra hircus*), and axis deer (*Axis axis*) that adversely modify habitat (HBMP 2008; W. Moses, pers. comm. 2006; F. Starr, pers. comm. 2006; R. Kallstrom, pers. comm. 2008). Goats are being raised near the Puu Kahulianapa population on Maui (F. Starr, pers. comm. 2006).

The goat, a species originally native to the Middle East and India, was successfully introduced to the Hawaiian Islands in 1792. Currently, populations exist on Kauai, Oahu, Maui, Molokai, and Hawaii. Goats browse on introduced grasses and native plants, trample roots and seedlings, cause erosion, and promote the invasion of alien plants. They are able to forage in extremely rugged terrain and have a high reproductive capacity (Clarke and Cuddihy 1980; van Riper and van Riper 1982; Scott *et al.* 1986; Tomich 1986; Culliney 1988; Cuddihy and Stone 1990). The effects on mesic and wet forest habitat by the foraging of feral goats have also been reported in fencing studies. An exclosure analysis demonstrated that release from goat pressure by fencing resulted in an immediate recovery in height growth and numbers of vegetative resprouts of the native tree *Acacia koa* (Spatz and Mueller-Dombois 1973). Another study at Puuwaawaa on the island of Hawaii demonstrated that prior to management actions in 1985, regeneration of endemic shrubs and trees in the grazed area was almost totally lacking, contributing to the invasion of the forest understory by exotic grasses and weeds. After the removal of grazing animals in 1985, koa and *Metrosideros* spp. (ohia) seedlings were observed geminating by the thousands (Department of Land and Natural Resources 2002).

Axis deer were introduced to Molokai in 1868, and within 30 years the population was estimated at 7,000 animals. By 1996, the population at Kalaupapa had remarkable negative impacts on the vegetation (Dorman 1996). Axis deer eat native vegetation, trample roots and seedlings, cause erosion, and promote the invasion of alien plants, and can jump fences constructed for feral pig control. The interaction of feral pigs and axis deer has reduced the Metrosideros-Cibotium (ohia-hapuu) rain forest to a grassy scrubland (Dorman 1996). Axis deer have moved from their preferred habitat in relatively open, lower elevation shrub areas, into the rain forest above Halawa Valley, likely due to hunting pressure (Dorman 1996). Currently, the axis deer population is estimated to be at least 1,500 on Molokai ranch lands alone and 5,000 to 6,000 animals for Molokai and Lanai combined (Dorman 1996; P. Nicholas, Molokai Ranch, in litt. 2006). Axis deer were introduced to Maui in 1959, with five being released east of Kihei. By 1968, the Maui population was estimated to be 85 to 90 animals and currently there is concern that their numbers could expand to between 15,000 to 20,000 or more within a few years (Waring 1996; E. Nishibayashi, TNC, in litt. 2001; S. Anderson, University of California-Davis, in litt. 2001). Deer are primarily grazers, but also browse numerous plant species including those grown as commercial crops (Waring 1996; J. Simpson, Kula farmer, in litt. 2001).

Hawaiian ecosystems, having evolved without hoofed mammals, are susceptible to large-scale disturbance by introduced ungulates (Loope *et al.* 1991). Because of demonstrated habitat modifications by feral goats and wild deer, such as destruction of native plants, disruption of topsoil leading to erosion, and establishment and spread of nonnative plants; the Service believes they are a threat to this species.

B. Overutilization for commercial, recreational, scientific, or educational purposes. *Pseudognaphalium sandwicensium* var. *molokaiense* may be collected for making lei (floral necklaces). Off-road vehicles are a potential threat to this variety (HBMP 2008).

C. Disease or predation.

Predation by feral goats and wild deer is a likely threat to this subspecies (HBMP 2008). Goats browse on introduced grasses and native plants, and are able to reach more remote and inaccessible areas than other ungulates. They thrive on a variety of food plants, and are instrumental in the decline of native vegetation in many areas (Cuddihy and Stone 1990). The numbers of deer on Maui have been increasing since their introduction in 1959. Damage to fencing and crops has also been reported (J. Simpson, in litt. 2001).

Because Hawaii's native plants evolved without any browsing or grazing mammals present, many lost natural defenses to such impacts (Carlquist 1980). Therefore, even though there are no observations of direct browsing on *Pseudognaphalium sandwicensium* var. *molokaiense*, it is likely that goats and deer impact this species directly.

D. The inadequacy of existing regulatory mechanisms.

Pseudognaphalium sandwicensium var. molokaiense currently receives no protection under Hawaii's endangered species law (HRS, Sect. 195-D) or the Federal Endangered Species Act (16 U.S.C. §1531-1544).

Goats and deer are managed as game animals in Hawaii. Goat and deer hunting is allowed on all islands either year-round or during certain months, depending on the area (Hawaii Department of Land and Natural Resources 1999, 2003); however, public hunting is not adequate to eliminate this threat to *Pseudognaphalium sandwicensium* var. *molokaiense*.

E. Other natural or manmade factors affecting its continued existence.

Alien plant species are a threat to *Pseudognaphalium sandwicensium* var. *molokaiense* as they degrade habitat and outcompete native plants (HBMP 2008; W. Moses, pers. comm. 2006). The nonnative plants reported to be the greatest threats to this species are: *Prosopis pallida* (kiawe), *Pluchea* sp. (saltbush), *Cenchrus ciliaris* (buffelgrass), and *Setaria parviflora* (foxtail) (W. Moses, pers. comm. 2006).

Cenchrus ciliaris is a grass native to Africa and tropical Asia. It is naturalized in Hawaii and common in dry areas in a wide variety of disturbed habitats. It is fire-adapted, provides fuel for fires, and recovers quickly, increasing its cover with each succeeding fire (Pacific Island Ecosystems at Risk (PIER) 2006a).

Pluchea sp. There are two species of Pluchea in Hawaii, P. indica and P. carolinensis, and a cross between them (Pluchea x fosbergii). Pluchea indica is native to southern Asia, and P. carolinensis is native to Mexico, the West Indies, and South America (Wagner et al. 1999a). This 3 to 6 ft (1 to 2 m) tall, fast-growing shrub, forms thickets in dry habitats and can tolerate saline conditions. It is widespread in Hawaii from coastal areas up to almost 3,000 ft (900 m). The seeds are wind-dispersed (Francis 2006).

Prosopis pallida was introduced to Hawaii in 1828, and its seeds were used as fodder for ranch animals. The seeds were quickly spread by ranch animals. Kiawe became a dominant component of the vegetation in low elevation, dry, disturbed sites, as it is well adapted to dry habitats. It overshadows other vegetation and the deep tap roots use all available water. This species fixes nitrogen and can outcompete native species (Wagner *et al.* 1999; PIER 2006b).

Setaria parviflora is a perennial grass native to Europe, introduced to Hawaii around 1895. This grass is naturalized in a wide variety of habitat, from wet to dry, low, to high elevations, in pastures, urban sites, and agricultural lands. The culms can be up to 4 ft (1.2 m) tall, shading and crowding out native plant species (O'Connor 1999). Setaria parviflora may occur as a single plant or as a significant colony (University of Florida 2005).

The original native flora of Hawaii consisted of about 1,400 species, nearly 90 percent of which were endemic. Of the total native and naturalized Hawaiian flora of 1,817 taxa, 47 percent were introduced from other parts of the world, and nearly 100 species have become pests (Smith 1985; Wagner *et al.* 1999a). Confirmed personal observations (W. Moses, pers. comm. 2006) and several studies (Cuddihy and Stone 1990; Wood and Perlman 1997; Robichaux *et al.* 1998, p. 4) indicate nonnative plant species may outcompete native plants similar to *Pseudognaphalium sandwicensium* var. *molokaiense*. Competition may be for space, light, water, or nutrients, or there may be a chemical produced that inhibits growth of other plants (Smith 1985; Cuddihy and Stone 1990). In addition, nonnative pest plants found in habitat similar to that of this species have been shown to make the habitat less suitable for native species (Smathers and Gardner

1978; Smith 1985; Loope and Medeiros 1992; Medeiros *et al.* 1992; Ellshoff *et al.* 1995; Meyer and Florence 1996; Medeiros *et al.* 1997; Loope *et al.* 2004). In particular, alien pest plant species degrade habitat by modifying availability of light, altering soil-water regimes, modifying nutrient cycling, or altering fire characteristics of native plant communities (Smith 1985; Cuddihy and Stone 1990; Vitousek *et al.* 1997). Because of demonstrated habitat modification and resource competition by nonnative plant species in habitat similar to the coastal dune habitat of *P. sandwicensium* var. *molokaiense*, the Service believes nonnative plant species are a threat to this species.

In addition, species like *Pseudognaphalium sandwicensium* var. *molokaiense* that are endemic to small islands are inherently more vulnerable to extinction than widespread species because of the higher risks posed to a few populations and individuals by genetic bottlenecks, random demographic fluctuations and localized catastrophes such as hurricanes (Pimm *et al.* 1988; Mangel and Tier 1994).

CONSERVATION MEASURES PLANNED OR IMPLEMENTED

Weed control is ongoing at the Moomomi Preserve population of *Pseudognaphalium sandwicensium* var. *molokaiense* on Molokai (The Nature Conservancy of Hawaii 2007; R. Kallstrom, pers. comm. 2008). This species is represented in an ex situ collection at Maui Nui Botanical Garden (S. Seidman, Maui Nui Botanical Garden, pers. comm. 2006).

SUMMARY OF THREATS

Based on our evaluation of habitat degradation and loss by feral goats, axis deer, and nonnative plants, we conclude there is sufficient information to develop a proposed rule for this species due to the present and threatened destruction, modification, or curtailment of its habitat and range, and the displacement of individuals of *Pseudognaphalium sandwicensium* var. *molokaiense*, due to competition with nonnative plants for space, nutrients, water, air, and light. Randomly occurring natural events are a likely threat to this variety due to small population sizes. Potential threats include destruction by off-road vehicles and collection for lei-making. We find that this species is warranted for listing throughout all of its range, and, therefore, find that it is unnecessary to analyze whether it is threatened or endangered in a significant portion of its range.

RECOMMENDED CONSERVATION MEASURES:

- Survey for populations of *Pseudognaphalium sandwicensium* var. *molokaiense* in areas of potentially suitable habitat
- Control feral goats and axis deer
- Control alien plants
- Continue propagation efforts for maintenance of genetic stock
- Reintroduce individuals into suitable habitat within historic range that is being managed for known threats to this species

LISTING PRIORITY

THREAT			
Magnitude	Immediacy	Taxonomy	Priority
High	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	1 2 3* 4 5 6
Moderate to Low	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	7 8 9 10 11 12

Rationale for listing priority number:

Magnitude:

This species is highly threatened by feral goats (Maui) and axis deer (Maui and Molokai), that degrade and destroy habitat, and by nonnative plants that compete for light and nutrients. Potential threats include collection for lei and damage or destruction of individuals and habitat by off-road vehicles. Threats to the strand vegetation in the dry consolidated dune habitat of *Pseudognaphalium sandwicensium* var. *molokaiense*, and to individuals of this species, occur throughout its range and are expected to continue or increase without their control or eradication. While weed control protects one population on Molokai, no conservation efforts have been initiated to date for the remaining populations on Molokai or on Maui.

Immediacy of Threats:

Threats to *Pseudognaphalium sandwicensium* var. *molokaiense* from feral goats and axis deer, and nonnative plants are considered imminent because they are ongoing.

Yes Have you promptly reviewed all of the information received regarding the species for the purpose of determining whether emergency listing is needed?

Is Emergency Listing Warranted? No. The species does not appear to be appropriate for emergency listing at this time because the immediacy of the threats is not so great as to imperil a significant proportion of the taxon within the time frame of the routine listing process. Weed control protects one population of *Pseudognaphalium sandwicensium* var. *molokaiense* on Molokai. However, no conservation efforts have been initiated to date for the populations on Maui. If it becomes apparent that the routine listing process is not sufficient to prevent large losses that may result in this species' extinction, then the emergency rule process for this species

will be initiated. We will continue to monitor the status of *P. sandwicensium* var. *molokaiense* as new information becomes available. This review will determine if a change in status is warranted, including the need to make prompt use of emergency listing procedures.

DESCRIPTION OF MONITORING

Much of the information on this form is based on the results of a meeting of 20 botanical experts held by the Center for Plant Conservation in December of 1995. We incorporated additional information on this species from our files and the most recent supplement to the *Manual of Flowering Plants of Hawaii* (Wagner and Herbst 2003). In 2004, the Pacific Islands Office contacted the following species experts: Robert Hobdy, retired from the Hawaii Division of Forestry and Wildlife; Joel Lau, Hawaii Biodiversity and Mapping Program; Arthur Medeiros, U.S.G.S. Biological Resources Discipline; Hank Oppenheimer, resource manager for the Maui Land and Pineapple Company; and Steve Perlman and Ken Wood, National Tropical Botanical Garden. No new information was provided. In 2005 we contacted species experts, and confirmation of the status was provided by Wailana Moses of The Nature Conservancy of Hawaii. In 2006 new status information was provided by F. Starr, U.S.G.S. Biological Resources Discipline, S. Seidman, Maui Nui Botanical Gardens, and W. Moses, The Nature Conservancy of Hawaii. No new information was received in 2008. In 2009 we received new information from Russell Kallstrom. In 2010, we contacted the species experts listed below and received no new information.

List all experts contacted:

Agorastos, Nick O2/09/10 Division of Forestry and Wildlife Anderson, Stephen O2/09/10 Private Contractor Bakutis, Ane O2/09/10 Division of Forestry and Wildlife O2/09/10 Private Contractor Bakutis, Ane O2/09/10 Division of Forestry and Wildlife O2/09/10 Private Contractor Division of Prevention Program, Molokai U.S. FWS, Partners Program, Hawaii Island D2/09/10 Division of Prevention Program, Molokai U.S. FWS, Partners Program, Hawaii Island D2/09/10 Division OF Version Program, Molokai U.S. FWS, Partners Program, Hawaii Island D2/09/10 Division OF Version Program, Molokai D2/09/10 Division OF Version Program, Molokai D2/09/10 Division OF Version Program, Molokai D2/09/10 Division OF Version Program, Hawaii Island D2/09/10 Division OF Version Program, Hawaii Island D2/09/10 Division OF Version Program, Oahu D2/09/10 D2/09/10 D2/09/10 D2/09/10 D3/09/10 D3/09/10 D4/09/10 D4/
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Higashino, Jennifer 02/09/10 U.S. FWS, Maui
Imada, Clyde 02/09/10 Bishop Museum
Jacobi, Jim 02/09/10 U.S.G.S., Biological Resources Division

Kawakami, Galen	02/09/10	Division of Forestry and Wildlife, Kauai
Kawelo, Kapua	02/09/10	U.S. Army, Environmental Division
Kier, Matt	02/09/10	U.S. Army, Environmental Division
Kiyabu, Brian	02/09/10	Amy Greenwell Botanical Garden
Kraus, Jim	02/09/10	U.S. FWS, Hakalau NWR
Medeiros, Arthur	02/09/10	U.S. Geological Survey
Misaki, Ed	02/09/10	The Nature Conservancy, Molokai
Moriyasu, Patty	02/09/10	Volcano Rare Plant Facility, Hawaii Island
Moses, Wailana	02/09/10	The Nature Conservancy, Molokai
Nakai, Glynnis	02/09/10	U.S. FWS, Refuges, Maui
Oppenheimer, Hank	02/09/10	Plant Extinction Prevention Program, Maui Nui
Palomino, Anna	02/09/10	Olinda Rare Plant Nursery, Maui
Palumbo, David	02/09/10	National Park Service, Haleakala NP, Maui
Pepi, Vanessa	02/09/10	U.S. Navy, Environmental Contractor
Perlman, Steve	02/09/10	National Tropical Botanical Garden
Perry, Lyman	02/09/10	Division of Forestry and Wildlife, Hawaii Island
Plunkett, Bryan	02/09/10	Lanai Forest and Watershed Partnership
Pratt, Linda	02/09/10	U.S.G.S., Biological Resources Division
Purell, Melora	02/09/10	Kohala Watershed Partnership
Seidman, Stephanie	02/09/10	Maui Nui Botanical Garden
Shishido, Glenn	02/09/10	Division of Forestry and Wildlife, Maui
Silbernagle, Mike	02/09/10	U.S. FWS, Refuges, Oahu
Smith, Miranda	02/09/10	Koolau Mountains Watershed Partnership
Starr, Forest	02/09/10	U.S. Geological Survey
Tanaka, Daniel	02/09/10	Puu Kukui Watershed Preserve
Ward, Joe	02/09/10	Puu Kukui Watershed Preserve
Welton, Patti	02/09/10	National Park Service, Haleakala NP, Maui
Wood, Ken	02/09/10	National Tropical Botanical Garden
Wysong, Michael	02/09/10	DLNR Natural Area Reserves, Kauai

The Hawaii Biodiversity and Mapping Program identified this species as vulnerable (HBMP 2006). Based on the International Union for Conservation of Nature and Natural Resources Red List of Threatened Species, this species is recognized as Endangered (facing a very high risk of extinction in the wild) by Wagner *et al.* (1999b). *Pseudognaphalium sandwicensium* var. *molokaiense* is not included in the list of species in Hawaii's 2005 Comprehensive Wildlife Conservation Strategy (Mitchell *et al.* 2005).

COORDINATION WITH STATES

On February 11, 2010, we provided the Hawaii Division of Forestry and Wildlife with copies of our most recent candidate assessments for their review and comment. No additional information or comments were received.

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APPROVAL/CONCURRENCE: Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes, including elevations or removals from candidate status and listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all resubmitted 12-month petition findings, additions or removal of species from candidate status, and listing priority changes.

Approve:	0 0 0			7 7
Acting (10	nal Director, Region 1, Fish and W	ildlife S	ervice	5/18/10 Date
	ACTING Director, Fish and Wildlife Service	مک		
Concur:	Director, Fish and Wildlife Service	ce (October 22, 20	10
Do not concur	:	-	Date: _	
Director's Ren	narks:			
Date of annual Conducted by:	review: <u>Cheryl Phillipson, Pacific Islands FV</u> Biologist, Prelisting and Listing Prog	<u>WO</u>	pril 21, 2010	
Comments:				
PIFWO Revie	<u>w</u>			
Reviewed by:	Christa Russell Prelisting and Listing Program Coord		pril 26, 2010	
	Marilet Zablan Assistant Field Supervisor, Endanger		pril 26, 2010 es Division	
	Gina Shultz Acting Field Supervisor	Date: A	pril 30, 2010	